

M.B. Vs. Redroof Inns

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,  
D.P., A.F., C.A., R.K., K.P.  
and T.H.,

Plaintiffs,

vs.

RED ROOF INNS, INC.; FMW RRI  
NC, LLC; RED ROOF FRANCHISING,  
LLC; RRI WEST MANAGEMENT, LLC;  
VAHARI HOTEL, LLC; WESTMONT  
HOSPITALITY GROUP, INC.;  
and RRI III, LLC,  
Defendants.**PL Sum. J.****Ex. 009**CIVIL ACTION NO.:  
1:20-CV-05263-MHCJANE DOE 1-4  
Plaintiffs,

vs.

RED ROOF INNS, INC., et al.,  
Defendants.CIVIL ACTION NO.:  
1:21-CV-04278-WMR

VIDEOTAPED DEPOSITION OF M.K.

March 22, 2022

9:49 a.m.

1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia  
Carolyn M. Carboni, RPR, RMR, CCR-B-878  
Leo Mileman, Videographer

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## 1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs in W.K., et al. v. Red  
3 Roof Inns, et al. case:

4 PATRICK J. McDONOUGH, ESQUIRE

5 JONATHAN TONGE, ESQUIRE

6 Andersen Tate & Carr, PC

7 1960 Satellite Boulevard

8 Suite 4000

9 Duluth, Georgia 30097

10 770.822.0900

11  
12 On behalf of the Plaintiffs in Jane Doe, et al. v.  
13 Westmont Hospitality Group, et al. case:

14 TIANA S. MYKKELTVEDT, ESQUIRE

15 MICHAEL R. BAUMRIND, ESQUIRE

16 JULIANA MESA, ESQUIRE (via Zoom)

17 Bondurant Mixson & Elmore LLP

18 One Atlantic Center

19 Suite 3900

20 1201 West Peachtree Street

21 Atlanta, Georgia 30309

22 404.881.4144

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1 APPEARANCES (Continued):

2 On behalf of the Defendants Red Roof Inns, Inc.;  
3 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI  
4 West Management, LLC; Westmont Hospitality Group,  
5 Inc.; and RRI III, LLC:

6 ADI ALLUSHI, ESQUIRE

7 PEYTON PATTERSON, ESQUIRE

8 Lewis Brisbois Bisgaard & Smith LLP

9 600 Peachtree Street

10 Suite 4700

11 Atlanta, Georgia 30308

12 404.348.8585

13 On behalf of Defendant Sai National Hospitality  
14 Ventures in E.F. v. Red Roof Inns, et al. case:

15 C. SHANE KEITH, ESQUIRE

16 Hawkins Parnell & Young, LLP

17 Suite 4000

18 303 Peachtree Street

19 Atlanta, Georgia 30308

20 404.614.7400

21 Also Present:

22 Samantha Girschick (via Zoom)

23 Beth Richardson (via Zoom)

24 - - -

25

1           A       Yeah, because I remember when I was in  
2   Atlanta, they were going through their divorce  
3   process.

4           Q       Were you ever abused as a child?

5           A       Yes.

6           Q       By whom?

7           A       Well, what kind of abuse?

8           Q       Well, that was a big, open-ended question,  
9   and you said yes. So you tell me what kind of  
10  abuse.

11          A       I would say I was verbally abused at  
12  times, physically abused sometimes, and those times  
13  when I was sexually abused.

14          Q       Okay. Let's go through each one of those.  
15  Who verbally abused you?

16          A       My aunts and my mother at times.

17          Q       Okay. And when you say "verbal abuse,"  
18  was that just -- was that yelling at you? Was that  
19  calling you names? Was that bullying you?

20          A       Really just putting me down.

21          Q       Okay. Bullying?

22          A       Yeah.

23          Q       Okay. Physical abuse, who physically  
24  abused you?

25          A       Well, physical --

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1 Q I'm separating that from sexual.

2 A Yeah. So let's take the physical out  
3 because no one really, like, physically abused me.

4 Q Nobody just beat you up?

5 A Exactly.

6 Q Okay.

7 A It was just the sexual abuse that was --

8 Q [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 A [REDACTED]

2 Q [REDACTED] okay. So [REDACTED] was  
3 driving?

4 A Yes.

5 Q Go ahead.

6 A So he was the one that was driving, and I  
7 don't know why I let him drive, but there was a  
8 police that just appeared behind us fast. And he  
9 already had some warrants and stuff out for his  
10 name. So then that's when we switched quick, so I  
11 took back the driving wheel and he sat in the  
12 passenger's seat.

13 Q While the car was moving?

14 A Huh?

15 Q While the car was moving?

16 A No. Once we stopped, we just swapped real  
17 quick.

18 Q Okay.

19 A Yeah. And I ended up getting arrested.

20 Q Want to rethink that decision?

21 A Huh?

22 Q I said you probably want to rethink that  
23 decision right there.

24 A Yeah.

25 Q Do you know why -- I mean, just -- it was

1 just a suspended license. Do you know why they  
2 arrested you?

3 A I think the officer was just being -- and  
4 it was only suspended for a day and a half. It  
5 was -- it was my tag, though. Because the whole  
6 situation, all of my car stuff was expired, like  
7 everything needed to be updated.

8 And I was backed up financially because of  
9 the whole back and forth with the jobs. And so I  
10 was just caught in a really bad time, and I guess  
11 he just thought I was being irresponsible.

12 And then I think he was also upset that I  
13 was with him. You know, I guess he saw him as,  
14 like, oh, you have all this going on and you're  
15 with him, so I'm going to take you to jail, that's  
16 what it seemed like, because he just took me.

17 Q Okay. I don't understand that, I will be  
18 honest with you. I do not understand what you mean  
19 by he saw you with him. I assume you mean --

20 A Because he took information.

21 Q Hold on second. All right. Hold on a  
22 second.

23 When you say he saw you with him, I assume  
24 what you're saying is the police officer saw you  
25 with [REDACTED]

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1 A Yeah. I was upset about that.

2 Q I imagine you were. How long were you in  
3 lockup?

4 A Three days.

5 Q Over on Memorial Drive at DeKalb PD?

6 A I don't remember the address exactly, but  
7 DeKalb County.

8 Q DeKalb County lockup?

9 A Yeah.

10 Q Okay. Had the trafficking started at this  
11 point?

12 A Right after -- after I got out of jail,  
13 that's when things took a turn.

14 Q Okay. All right. Well, let's go back.

15 A Okay.

16 Q Let's go back. When did you start --  
17 [REDACTED] was your boyfriend?

18 A Yeah.

19 Q For lack of a better term, you were  
20 hanging out with him?

21 A Yeah.

22 Q Were y'all living together?

23 A We just -- we literally just started  
24 living together because something went wrong with  
25 SafeLink. They came back, they took all their



1 equipment. They told us we only had until the end  
2 of the week to stay in the hotel, and then that's  
3 it.

4 Q Okay.

5 A And I got arrested -- yeah, literally,  
6 like the next day or the next two days after that,  
7 I got arrested. So me coming out of jail, I didn't  
8 have anywhere to stay.

9 Q That was a bad week for you right there?

10 A It was horrible.

11 Q Okay. So let's back up a little bit. So  
12 you're working at SafeLink?

13 A Yeah.

14 Q You're staying at a hotel on Candler?

15 A Uh-huh.

16 Q Do you remember what hotel it was?

17 A I could picture it in my head, but I don't  
18 remember the name.

19 Q Is it off 20?

20 A I don't know.

21 Q Off the interstate?

22 A There's interstates everywhere in Atlanta.

23 Q That is true.

24 A I don't -- honestly, I'm not sure.

25 Q How would you -- how would you do your

1 Q Okay.

2 A Drae and Bless, between the both of them,  
3 they would drive me.

4 Q Was [REDACTED] ever a trafficker?

5 A He ended up getting arrested towards the  
6 beginning. And his brother is the one that  
7 basically took me -- or, like, brought me into the  
8 trafficking world --

9 Q Who is his brother?

10 A -- after he got out of the way.

11 Q I'm sorry. Who was his brother?

12 A His name -- I never knew his real name,  
13 but he went by Red.

14 Q Red?

15 A Uh-huh.

16 Q Did he have red hair?

17 A No. Because he's light skinned and they  
18 were Bloods, so it was -- yeah.

19 Q So [REDACTED] was a Blood?

20 A Yeah.

21 Q Okay. And I saw they called you Jamaica.  
22 Did you tell me why they called -- did I figure it  
23 out myself, because you lived in Jamaica for a  
24 while?

25 A So when I got to the Eco Lodge, that's

1 where they all met me. And as soon as I started  
2 talking, they're like, oh, you have an accent, and  
3 we're going to call you Jamaica, and then that's  
4 how they just called me Jamaica.

5 Q They thought you had an accent?

6 A Yeah, I didn't -- I don't know how, but  
7 they heard something, and they were like, oh, we'll  
8 call you Jamaica, and that was it.

9 Q Okay. All right. So let's back up.  
10 You're in jail, and you told me that your  
11 trafficking started right after you got out of  
12 jail?

13 A Uh-huh.

14 Q How? How do you -- how do you go from  
15 being you to being trafficked in a matter of a  
16 couple of days?

17 A Yeah, a couple weeks, days, weeks, yeah.

18 Q Tell me what happened.

19 A So -- so once I got out of jail, I wanted  
20 to go get my stuff, and I just moved in with [REDACTED]

21 Q Where was he living?

22 A And he didn't like those girls either  
23 because he kind of knew that they were going to be  
24 up to no good. And he was like, "Okay, come stay  
25 with me because I'll protect you." So I was like,

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1 A Yes.

2 Q Okay. So you've gotten out of jail.

3 A Yeah. Then I moved in with them.

4 Q All right.

5 A So from there, things kind of got -- so me  
6 living with him, I kind of got to understand more  
7 of who he is and more of who his brother was.  
8 Because [REDACTED] didn't really tell me exactly what  
9 they did and, you know -- because I was just seeing  
10 him.

11 But living with him, I saw a different  
12 side. And, like, I didn't even know that they were  
13 affiliated with gangs or anything until I started  
14 living with them. And then I started to see what  
15 they do, the kind of people that came by the house.  
16 And so me living with them kind of opened my eyes  
17 to who they're about, like what they're about and  
18 what they do --

19 Q Which is what?

20 A -- for a living.

21 They're professional scammers. They -- I  
22 say professional because, like, they make a living  
23 out of it.

24 Q They're hustlers?

25 A Yeah.

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1 Q Okay.

2 A The brother, Red, he was more involved in  
3 street activity than [REDACTED] was. So they had a lot  
4 of guy friends, a lot of guys that come to the  
5 house. And I remember one of them got killed and,  
6 oh, God, it was a mess. So one of them got killed,  
7 [REDACTED] went crazy because that was like his brother.  
8 So I don't --

9 Q But it wasn't his brother?

10 A No, no, it wasn't his blood brother. But  
11 he grew up with him, you know, like --

12 Q It was his buddy?

13 A Yeah. So he was really, really sad, you  
14 know, about that. So I remember, like, going with  
15 him to his mom's house, to the guy that passed  
16 away, his mom's house. And I was always with  
17 [REDACTED] And I don't know why or how he got his car,  
18 but he ended up getting his brother that passed,  
19 his car, and he would drive his car.

20 And the police ended up locking him up  
21 because they were still using the car in the case  
22 to figure out what happened, you know, the whole  
23 murder case. So he got arrested for grand auto  
24 theft. So he was out of the picture.

25 So from there --

1 Q Okay. Can we stop there?

2 A Yes.

3 Q Okay. Let me unpack a little bit of that.

4 A Okay.

5 Q In relation to when you moved in with

6 [REDACTED] and Red and Tasha --

7 A Yeah.

8 Q -- when did this -- when did the -- when  
9 did the -- I guess was he murdered; is that right?

10 A Yeah.

11 Q The other guy was shot and killed?

12 A Yeah, yeah.

13 Q When did this murder take place?

14 A Not too long after I moved in.

15 Q Days, weeks?

16 A I would say, like, a good two weeks. It  
17 wasn't really long. It was probably a good two  
18 weeks.

19 Q And is it during those two weeks' time  
20 that you're figuring out that these guys are into  
21 street activity?

22 A Yeah, yeah. Like the whole time -- like  
23 as soon as I moved in, as soon as I moved in, like  
24 from day to night, like just seeing what they do,  
25 seeing the kind of people that came by the house,

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1 just everything, I was like, oh, my God, and then  
2 boom, someone get killed. But I kind of seen that  
3 coming, you know.

4 Q Just because of what -- how they were?

5 A Yeah, yeah. I kind of seen it coming. So  
6 he ended up driving the car. They were trying to  
7 look for the guy that -- you know, what happened to  
8 his brother. So it was a whole drama thing, but  
9 him getting arrested, [REDACTED] got arrested.

10 Q How soon after the murder did [REDACTED] get  
11 arrested?

12 A Did [REDACTED] get arrested? Oh, like a couple  
13 of days.

14 Q Okay. So this was all within, like, two  
15 or three weeks of you moving in with him?

16 A Yeah, yeah. So from there -- so from  
17 there -- so the whole time, Red, he would never  
18 really talk to me too much unless I was by myself.  
19 And he would always try to, like, figure me out.  
20 And, you know, like he knew that I was kind of  
21 depending on [REDACTED] in a way, and I was just trying  
22 to get back on my feet and sort out my stuff.

23 So he would always kind of like, you know,  
24 like, "Oh, why don't you do this or, you know, I  
25 can get you -- I can get you some cards to where

1 you can make some quick money," da-da-da. Like he  
2 was always trying to, like, to help me.

3 So [REDACTED] being locked up, I'm still  
4 staying there, he told me, he was like, "Okay,  
5 look, I'm going to bring you to a spa."

6 Q Spa?

7 A Yeah. And he told me, "It's a nice spa.  
8 You're a pretty girl. Do some massages, and then  
9 I'm pretty sure I can get you money fast."

10 And he said how his friend worked there,  
11 and his friend was Safari, and Safari was owner of  
12 the spa in Buckhead. So he was like, "I'm going to  
13 take you over there and get you your money, get  
14 yourself together," and that's it.

15 So I was like, "Okay." Don't sound bad.  
16 Went to the spa, talked to Safari, and it wasn't  
17 what I thought it was. Because, yeah, you do  
18 massages, but then also, nine times out of ten, the  
19 men wanted a happy ending. So that was the case  
20 with the spa.

21 Q Okay. So let's break there. Let's go  
22 back and then we --

23 A Okay.

24 Q If it's okay, when you get to a breaking  
25 point, I'm going to unpack some stuff to -- okay?



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1 A Yes.

2 Q Both of them?

3 A Yes.

4 Q At the same time?

5 A Yes.

6 Q How many times?

7 A Just that one time.

8 Q Just one time. A threesome with those two  
9 guys one time?

10 A (Witness nods head.)

11 Q Yes?

12 A Yes.

13 Q How much did they pay you?

14 A So they were supposed to give me 500, but  
15 the next day, they only gave me 100. And they told  
16 me that it was still early in the day, the girls  
17 haven't made much money yet, da-da-da-da-da, so all  
18 they had for me was 100.

19 Q Did you continue to work at Safari?

20 A No. I was pissed off. So from there, I  
21 remember calling Red, I told him, "We'll have to  
22 figure something else out because they played me.  
23 I'm not getting paid. I'm not getting any money."

24 And I told him my situation, and he said,  
25 "Okay." He sounded excited. He was like, "I got

1 in jail, you're talking about the 24th and the  
2 25th.

3 A Uh-huh.

4 Q You stayed with Red -- you stayed with Red  
5 and [REDACTED] for two weeks. That puts you the end of  
6 August is one week?

7 A Yeah.

8 Q First week of September is the second  
9 week, right?

10 A Uh-huh.

11 Q And then a couple of weeks into -- a  
12 couple of weeks at Safari, right?

13 A Yeah, yeah.

14 Q So that's three weeks into September. So  
15 it's toward that last week of September that the  
16 trafficking starts?

17 A Basically, yeah.

18 Q Okay. All right. So you call Red and he  
19 seems excited?

20 A Yeah.

21 Q And is this where you met Bless and Drae?

22 A So he came and picked me up.

23 Q From Safari?

24 A Yeah. And I wanted him to do something to  
25 them because I was really upset. But he was like,

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1 "Look, I got something else for you, we can make  
2 even more money."

3 So he didn't tell me too much. We just  
4 drove over to the hotel, the Eco Lounge and --

5 Q Lodge.

6 A Lodge. When I walked in that room, Bless  
7 was there and Drae was there, some other guys were  
8 there, and Miami was there.

9 MR. McDONOUGH: Shane, I don't want to  
10 break your flow, but lunch is here whenever you  
11 decide you're at a break.

12 MR. KEITH: All right.

13 BY MR. KEITH:

14 Q So Drae, Bless, Miami?

15 A Uh-huh.

16 Q What about Slim, Kwan or Cash?

17 A I don't think Slim was there. But Kwan  
18 was there, and then some other guys. There was  
19 always a whole bunch of guys just there.

20 Q Just hangers-on or what? I mean --

21 A Yeah. I mean, they all do the same thing,  
22 so...

23 Q All right. So we're now toward the end of  
24 September and --

25 A Uh-huh.

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1 Q But I have interrogatory responses which  
2 tell me one story.

3 A Okay.

4 Q And then I have some psychological --  
5 well, some notes from something called SafeWay  
6 Psychological Services that tell me a different  
7 story.

8 A Okay.

9 Q So why don't I just do it this way: Tell  
10 me what happened when Red took you to the Econo  
11 Lodge --

12 A The Eco Lodge?

13 Q -- the Eco Lodge in Marietta. You told me  
14 that Drae was there.

15 A Yeah.

16 Q You told me that Bless was there, and some  
17 other hangers-on were there --

18 A Yes.

19 Q -- and Miami?

20 A Yeah, the girl, yeah.

21 Q All right. Walk me through it, and if  
22 it's okay, I might stop you every once in a while  
23 so that we don't get so far down.

24 A Okay.

25 Q So we can ask some -- maybe ask some

1 questions.

2 A So right after leaving from Safari, I went  
3 straight to the hotel.

4 Q And that's the same day?

5 A Yeah, same day.

6 Q Okay.

7 A I went right to the hotel thinking that I  
8 was going to be put in a position to make more  
9 money. That's all he told me.

10 So once we got to the hotel, Bless --  
11 Bless was like the main one. Like he kind of was  
12 like in charge of them for the most of it. So I  
13 could tell when I walked in, he was already  
14 anticipating me and the other guys were  
15 anticipating me coming.

16 And then Miami was just there in the --  
17 because it's a twin bedroom, and she was just there  
18 on the last bed, just there.

19 Q Okay.

20 A Yeah. But just the way she looked, it was  
21 obvious that she was being trafficked just by, you  
22 know, by the room and how she looked and how they  
23 were, like, anticipating me coming, it was just  
24 obvious to me what was going on.

25 Q Okay. Describe Bless to me.

1 Q Okay.

2 A So like short then.

3 Q Okay, short, okay.

4 A Yeah. So -- yeah, that's basically it.

5 Q Okay. Describe Drae to me.

6 By the way, let me ask, when you say  
7 medium height --

8 A Yeah, like 5'8", 5'9".

9 Q Okay. About my height?

10 A Yeah.

11 Q Because I'm 5'9".

12 A Yeah, because I remember I looked him in  
13 the eye, yeah.

14 Q All right.

15 A Drae, about the same height.

16 Q Okay. Oh, how heavy was -- how heavy was  
17 Bless?

18 A He wasn't -- he wasn't heavy. He was a  
19 slim figure.

20 Drae, about the same height. He didn't  
21 have a whole bunch of tattoos.

22 Q Black, White?

23 A Yeah, Black.

24 Q Okay. Skin tone, what --

25 A About our same --

1           A       So I just -- I remember just being shocked  
2       because I didn't expect to go into that setting.  
3       I'm thinking -- oh, I didn't -- I didn't even know  
4       what to think because he didn't even really tell me  
5       exactly what the next step was going to be. He  
6       just told me that he was going to take care of me.

7                       So once I walked in that room, looking at  
8       Miami, looking at the little kid, I just -- I just  
9       kind of froze because I didn't know what to think.  
10      And Bless was the one that came to me and told me  
11      to sit down. And he just told me what I was going  
12      to do.

13           Q       And what did he tell you you were going to  
14      do?

15           A       He first introduced me to Miami. And  
16      she's from Miami. She's actually from Ghoulz  
17      (phonetic), which is really close to where I live.

18           Q       So two Miami girls.

19           A       So he tried to make that a thing. I was  
20      like, "Okay, what's your name?" And that's when I  
21      spoke.

22                       And he was like, "Oh, you got a accent.  
23      I'm going to call you Jamaica."

24                       And then he was like, "Okay, from Miami,  
25      all right." Like he was just trying to get to know

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1 me, Bless, and then he told me what Miami does.

2 Q What did Miami do?

3 A She's a prostitute.

4 Q Well, what did he say? He said, "She's a  
5 prostitute" or did he say she's a --

6 A She's a worker. She's working.

7 Q Worker.

8 A So he told me what she does and how she  
9 make her money.

10 Q And how did he tell you she made her  
11 money?

12 A How she -- she sees dates. And Bless  
13 already knew what I was doing at the spa because he  
14 was like, "Okay, I know you were at the spa. So  
15 you kind of -- you already know." That's what he  
16 told me, he was like, "You already know."

17 So I was like, "Okay."

18 And then he said, "Miami, she works, so  
19 she sees dates."

20 So he told me that it was full-blown like  
21 sex, like it's not this, that; it's the real deal.

22 Q So he did -- he said, "It's not hand jobs  
23 and oral, it's full-blown"?

24 A Yeah, yeah. So he explained that to me.

25 He asked me -- like he was like, "You have a



1 phone?" You know, like things that I had. I told  
2 him I had my keys, and he was like, "Let me get  
3 your keys."

4 Q So you drove over there?

5 A Huh?

6 Q So your car had been driven over there?

7 A Red was using my car.

8 Q Okay.

9 A Because he put -- what did he do? He put  
10 like a tag or something on it, because my stuff was  
11 still out. So -- yeah, we drove my car over there,  
12 and he asked for my keys. "Let me see your keys."

13 He took my keys. And then he just  
14 explained to me -- he just went down and just told  
15 me exactly what I was going to do.

16 Q And what did he tell you you were going to  
17 do?

18 A He told me I was going to see dates. And  
19 I was going to make my money seeing dates.

20 Q Did he tell you what you were going to do  
21 with those dates?

22 A He didn't go too far into detail, but he  
23 just said that, you know, I'm going to be doing  
24 what I did at the spa.

25 Q Well, that was just hand jobs.

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1           A       Yeah. But that's what he said, he was  
2       like, "Miami, you know, she has -- she works with  
3       us. She sees her dates and everything. So you're  
4       going to be going like what Miami does. You're  
5       going to be seeing dates. Just like how you did at  
6       the spa, you're going to be seeing dates here,  
7       too."

8                       And then he was telling -- and then he  
9       told me -- he told me, he was like, instead of  
10      doing half, we're going to -- we're going to give  
11      you the money that you need to take care of what  
12      you have to take care of as you see your dates.  
13      And I was like...

14           Q       Did you say okay?

15           A       I just -- I didn't really -- I don't  
16      remember saying anything. I was still just like  
17      kind of like scared.

18           Q       Nobody had threatened you, had they?

19           A       They didn't. But I already knew who Red  
20      was, and I remember some faces from other events,  
21      from [REDACTED] brother getting killed, and I know the  
22      guys that -- I know who they were. And if they  
23      wanted to do something to me, they would. So I  
24      kind of just listened.

25           Q       Okay. Did you try to leave?

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1           A       I wanted to, but I know it wouldn't be  
2 smart for me to try to leave.

3           Q       All right. So you're -- okay. So you're  
4 there.

5           A       Yeah.

6           Q       Then what happens?

7           A       I remember just -- I stayed there all  
8 night. I saw one date that night, too, me and  
9 Miami. They made us do a threesome, and that was  
10 our first -- well, my first experience that night  
11 with them.

12          Q       So you had sex that night?

13          A       Yes.

14          Q       And it was with three?

15          A       It was a threesome, yeah.

16          Q       Two girls, one guy?

17          A       Yes.

18          Q       Did you see any money from that?

19          A       No. So what they did, Bless took the  
20 money from the door, from the guy, so I didn't see  
21 anything. And that's -- that was just the first  
22 time.

23          Q       Okay. Now that we've -- okay. So I need  
24 to ask some questions. We're getting into the part  
25 of the deposition where I have to ask --

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1 Q Okay. So this started then at the end of  
2 September of 2015 and ended at the end of  
3 April 2016?

4 A Can you say that one more time?

5 Q Sure. We worked out, based upon the  
6 arrest on 8/22, remember we worked that out?

7 A Yeah.

8 Q And we put you at the hotel around the end  
9 of September of 2015?

10 A Yes.

11 Q So the first night at the hotel is the  
12 first time you say that you had sex --

13 A Yes.

14 Q -- right?

15 A Uh-huh.

16 Q And then you're telling me that you were  
17 able to go home at the end of April 2016, right?

18 A Yes.

19 Q So the time period that we're talking  
20 about for trafficking, as you use that term, is the  
21 end of September 2015 to the end of April 2016?

22 A Yes.

23 Q Okay. So about seven, seven and a half  
24 months?

25 A Uh-huh.

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1 THE VIDEOGRAPHER: Oh, wait. Thank you.

2 BY MR. KEITH:

3 Q So either the first or the second night  
4 that you've gone to the Eco Lodge in Marietta with  
5 Red, you have to have a three-way with a date --

6 A With Miami.

7 Q -- and Miami?

8 A Yeah.

9 Q How much money did that cost the man?

10 A I'm not sure.

11 Q So who was your first trafficker?

12 A It was -- well, Bless was the one that was  
13 kind of in charge of the whole thing.

14 Q Okay.

15 A So he was the first one that trafficked  
16 me.

17 Q Well, the 'rogs pretty much state that it  
18 was [REDACTED]

19 A Yeah. I'm not sure why it says it was

20 [REDACTED] It was Bless.

21 Q I mean, it flat out says, "At some point,  
22 [REDACTED] and M.B. broke off from the group, but [REDACTED]  
23 continued to traffic M.B. at various hotels."

24 A They put the wrong person. That's  
25 supposed to be Drae.

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1 [REDACTED] got arrested, and after that, the trafficker  
2 named Drae began to traffic her at this and other  
3 hotels. Like [REDACTED] Drae would keep all money M.B.  
4 collected."

5 A I don't know why they still have [REDACTED]  
6 name there, but it should -- read it one more time.

7 Q If you look at Exhibit 3, on page 21, the  
8 first full paragraph there.

9 Have you had a chance to read that  
10 paragraph?

11 A Yeah. It just sounds a little confusing.

12 Q Well, I agree. This question specifically  
13 asks you to give a timeline of your trafficking at  
14 the Red Roof Smyrna from 2015 to 2016, which were  
15 the dates that were alleged in the complaint,  
16 generally 2015 to 2016.

17 And your response was that you were  
18 trafficked by Drae at the Smyrna Red Roof Inn from  
19 about November 2015 through January or February of  
20 2016.

21 A Uh-huh.

22 Q Right?

23 A Yes.

24 Q Is that true? That's when -- is that --  
25 is that the time that you were, to use your word,

1 A At Smyrna?

2 Q Yes, ma'am.

3 A Per day?

4 Q No, no. How many times -- how many times  
5 did you go there?

6 A About two to three times.

7 Q Two or three?

8 A Yeah.

9 Q Over that November to January/February  
10 time frame?

11 A In the same time bracket, yeah.

12 Q And how many stays -- so two or three  
13 stays. How long did each stay last?

14 A About three to four days.

15 Q So we're looking at somewhere between  
16 8 and 12 days total?

17 A Yeah, I would say that.

18 Q Well, actually, 6 to 12. Two times at  
19 three days would be six times, three times at four  
20 days would be 12 times, so 6 to 12 days, right?

21 A In that range.

22 Q Okay. So you were trafficked consistently  
23 from the end of September to the end of April?

24 A Yes.

25 Q Okay.

1           A       He got arrested, yeah, towards the  
2       beginning of April. And then I got myself together  
3       to leave, so yeah.

4           Q       So for October, November, December,  
5       January, February, March, that's six months, right?

6           A       Uh-huh.

7           Q       And then you have a week at the end of  
8       September?

9           A       Uh-huh.

10          Q       And then you have maybe a week at the  
11       beginning of April, right?

12          A       About -- yeah, about two weeks, yes.

13          Q       Six and a half months?

14          A       Yeah.

15          Q       So of the six and half months that you  
16       were trafficked by Bless and Drae, 6 to 12 of those  
17       days were at the Red Roof Smyrna?

18          A       Yes.

19          Q       Okay. Okay. How many men did you have  
20       sex with during your stays? Well, let me ask this.  
21       I should take that back.

22                 Did you ever have any female dates?

23          A       No.

24          Q       Okay. So they were all men?

25          A       Uh-huh.



1 in a minute.

2 So at Red Roof, you only had vaginal  
3 intercourse and a man or two performed oral sex on  
4 you?

5 A Yes.

6 Q Now, you were very quick to say that you  
7 didn't perform oral sex on men. You just didn't --  
8 that was just not part of the thing you did?

9 A Yeah. I just didn't want to do that.

10 Q Okay. And you were free not to do that?

11 MR. BAUMRIND: Objection.

12 A Yeah.

13 BY MR. KEITH:

14 Q Okay.

15 A As long as they -- well, Bless told me --  
16 because I had a goal per day. So he didn't care  
17 what I did as long as I reached the goal.

18 Q But nobody was telling you, you've got to  
19 give blowjobs, right?

20 A Yeah. No one forced me to do that.

21 Q Nobody was telling you, you've got to have  
22 anal sex, right?

23 A No.

24 Q Nobody was telling you, you've got to have  
25 sex with 20 men a day, right?

1 wasn't a trafficker.

2 A He wasn't. But he still was the one that  
3 hit me, though.

4 Q Was this before -- okay. Let me back up.  
5 So --

6 A Well, I don't want to confuse the --

7 Q Yeah, let's back up and --

8 A -- line, the story line.

9 Q Yeah.

10 A Because his brother always been trying to  
11 get me into the spa, and [REDACTED] was the one that I  
12 always kind of pushed back with me going. So I  
13 guess for the fact that I was interested in  
14 checking out the spa, he didn't like that, and  
15 that's why he hit me.

16 Q So this was before he ever went to jail?

17 A Yeah.

18 Q So [REDACTED] didn't want you getting into the  
19 business?

20 A He -- obviously, looking at it from today,  
21 obviously, he knew more than what I did. So he  
22 just was trying to avoid me going that route.

23 Q None of the traffickers that you've listed  
24 here hit you?

25 A No one else -- no one else touched me.

1 Q Did any of them make you have sex with  
2 them?

3 A No.

4 Q Okay. Do you -- what price -- what prices  
5 did -- were charged for you for -- was it charged  
6 by the hour or was it charged by the act? Was  
7 it --

8 A Most of it was 30 minutes and then an hour  
9 sessions.

10 Q Okay. So what was 30 minutes?

11 A I don't remember exactly. I think it was  
12 either 80 to 100.

13 Q For 30?

14 A Yeah.

15 Q Okay. And then for an hour?

16 A Between, like, 200 and -- 200 and 250.

17 Q And during that time, the person could ask  
18 for whatever they wanted to?

19 A Except for what I didn't want to do.

20 Q Well, what you didn't want to -- they  
21 could ask for whatever they wanted to, but you were  
22 going to do what you were going to do, right?

23 A Yeah, but I wasn't going to do certain  
24 things.

25 Q Was it -- do you know, would it have been

1 Yeah, I had two phones.

2 Q So why did you have a trap phone?

3 A Huh?

4 Q Why did you have a trap phone?

5 A Why did I have a trap phone?

6 Q Uh-huh.

7 A Just to be more organized.

8 Q And not to have your name associated with  
9 the --

10 A Yeah.

11 Q -- with the number?

12 A Basically, yeah. Well, yeah, just to  
13 separate -- like just so I know -- just so -- yeah,  
14 like I knew that this phone was just for that.

15 Q Just for --

16 A And then they also accessed the phone,  
17 too. You know, it was just -- just that phone,  
18 like that's where everything took place on this  
19 phone.

20 Q That was the business phone?

21 A Yeah, basically.

22 Q And you had your own phone?

23 A Yes.

24 Q And that never got cut off?

25 A No.

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1 Q What did the ad say --

2 A I saw them.

3 Q -- typically? Because I didn't see any  
4 ads for you.

5 A What would they say? Like hot Caribbean  
6 girl. I don't remember exactly what they said.

7 Q Did they ever just come right out and say,  
8 "Come to the hotel, and for 30 minutes for \$100,  
9 you can have sex with Remy"?

10 A No.

11 Q Okay.

12 A We -- not we, because it was them that put  
13 the ads together, but the way they put the ads up  
14 is to say flowers.

15 Q Oh, so they had to pay flowers?

16 A Yeah.

17 Q Right?

18 A They said flowers -- and they explained to  
19 me to say flowers because they don't want the SWAT  
20 to come.

21 Q You had to keep it a secret, right?

22 A Yeah.

23 Q Because this is illegal, right?

24 A Yeah.

25 Q When you were being trafficked, you didn't

1 of me.

2 Q Okay. So when was it that you realized  
3 that this whole time you were being trafficked and  
4 that you didn't have this option that you thought  
5 you had?

6 A Basically, that first night.

7 MR. KEITH: If I -- let me read back what  
8 I just wrote.

9 (Off-the-record discussion.)

10 BY MR. KEITH:

11 Q Okay. So what you just said was, "I  
12 couldn't believe I was enlaced in this situation.  
13 So at first, I didn't believe I was a trafficker  
14 because it always seemed like I had an option, but  
15 at the same time, they were in control of me."

16 A Yeah.

17 Q That's what you said. Okay. So at some  
18 point in time, it seemed to you that you had an  
19 option?

20 A Yeah, the way they would word things to  
21 me.

22 Q Right. So at that time, you weren't even  
23 self-identifying as a trafficking victim; is that  
24 fair?

25 MR. BAUMRIND: Objection.

1 A Ask it one more time.

2 BY MR. KEITH:

3 Q Sure. You weren't even -- at this time,  
4 when you thought you had an option based upon what  
5 they were telling you, you weren't even  
6 self-identifying as a trafficking victim, right?

7 MR. BAUMRIND: Objection.

8 A Oh, that's a tricky question because I --  
9 before this experience, I never really understood  
10 what trafficking really was --

11 BY MR. KEITH:

12 Q Okay.

13 A -- until I was in the situation of being  
14 trafficked.

15 Q Okay.

16 A And the whole time from Safari to the  
17 hotel room, I noticed that I was being prepped  
18 without even knowing. I was being prepped to  
19 traffic, to be a traffic -- to be a victim of  
20 trafficking without knowing. Because I'm here  
21 thinking, okay, I'm just trying to take care of  
22 myself. But all along, they already had their eye  
23 on me and had a plan.

24 Q Okay. So you didn't even realize that you  
25 were being groomed to be a trafficking victim,

1 right?

2 A Yeah, yeah.

3 Q And while you were -- and while you were  
4 in the midst of it all, you thought you had  
5 options, right?

6 A Yeah.

7 Q And so it wasn't until you got out of it  
8 and could look back on it with clear eyes that you  
9 realized this whole time you were being groomed and  
10 you were a victim the whole time, you didn't really  
11 have a choice at all, right?

12 A Uh-huh. Well, after -- once Bless came to  
13 me and just the way he spoke to me, like he made it  
14 sound like they were going to take care of me.

15 Q Okay.

16 A Like, it was like, oh, all of us, us guys,  
17 we're going to take care of you. We're going to  
18 handle the money. We're going to make sure your  
19 bills get paid. We know about your car situation.  
20 We're going to make sure all that gets taken care  
21 of. We're going to take care of you.

22 That's how they made it seem.

23 Q If you just had sex with them, right --  
24 for them?

25 A I didn't have sex with them.



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1 Q Cash?

2 A Yeah.

3 Q To who?

4 A What do you mean to who?

5 Q How would the -- how would the payment go  
6 down?

7 A So they'd just bring cash to me.

8 Q To you?

9 A Yeah.

10 Q Okay. And then what would you do with the  
11 money?

12 A I gave it to them.

13 Q To who?

14 A To Bless or Drae.

15 Q Okay. So they trusted you to take the  
16 money?

17 A Yeah, because they knew exactly how --  
18 they were the one that put the ad up, so they knew  
19 how much money that I'm going to get.

20 Q Did you get the money up front; is that  
21 how it works?

22 A Yeah.

23 Q Okay. Which persons trafficked you, to  
24 use your term, at the Red Roof? Was that Drae and  
25 Bless?

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1 A At first, the first time, yeah, Bless was  
2 there.

3 Q And then it was --

4 A And then once we broke off, it was only me  
5 and Drae.

6 Q Let's talk about the break off.

7 A Yeah.

8 Q When did y'all break-off?

9 A That was so random. It happened, I would  
10 say, maybe like a month and a half, two months in.  
11 Because Drae -- yeah, I mean, it was kind of funny  
12 because even after we broke off, Bless came back  
13 and then he left again. But the initial break-off,  
14 I would say like a month, a month and a half, of us  
15 all being together, then we separated.

16 Q Let me see if I can help with this.

17 A Okay.

18 Q So you've testified that you think the  
19 first time that you were at the Red Roof, Bless was  
20 there, right?

21 A Uh-huh.

22 Q And you've testified that you think that  
23 was in November of 2015?

24 A Yes.

25 Q So if you started at the end of September,

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1 Q Okay.

2 A And then Slim came. Like, it wasn't just  
3 me and Drae the whole time. It was other  
4 traffickers that was involved, too, that came and  
5 left. But Drae was the one that was consistent  
6 with me.

7 Q Who was running the show? That's what I'm  
8 trying to figure out.

9 A So Bless is the one up here.

10 Q Okay.

11 A He's the one that's controlling Marietta  
12 altogether. So it doesn't matter if Slim comes in,  
13 Kwan, everyone have to answer to Bless.

14 So that's why Bless, he was able to kind  
15 of come in and out because he was the one that was  
16 controlling stuff in the street. So the  
17 trafficking was just a part of what's going on.  
18 It's just a fraction of, you know, of what he  
19 controls.

20 Q It sounds like organized crime, like a  
21 mob.

22 A Well, they definitely tricked me.

23 Q Was it a gang? Is this what it was? Was  
24 it a gang?

25 A Basically, yeah.

1 Slim would show up and also traffic you?

2 A Well, they had girls, too.

3 Q Okay.

4 A It's like everyone had their girl to keep  
5 their eye on.

6 Q Okay. That's what I'm trying to figure  
7 out when you said they would just show up. They  
8 weren't controlling you; they were just alongside  
9 you?

10 A Well, if they're there, automatically,  
11 they're kind of in that authority, you know,  
12 like --

13 Q Were you paying them?

14 A They would handle the money. Drae would  
15 always handle the money. But, like, if Drae had to  
16 go somewhere or get some cigarettes or whatever, it  
17 would be Slim. And Slim would have to be honest  
18 and tell him, "Yeah, I got the money." Like if he  
19 were to go and I had a date coming, Slim was the  
20 one in charge.

21 Q Did Slim ever try to screw Drae out of any  
22 money?

23 A He was really shady because he gave -- so  
24 he gave Drae a jammed gun one time because -- a lot  
25 of it, I didn't know exactly what happened, with

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1           A       Yeah, yeah. He was being fake just to be  
2 around us.

3           Q       Now, were the rooms at the Red Roof, when  
4 you were there with Bless and then later with Drae,  
5 were they ever under your name?

6           A       I don't remember checking in when I was at  
7 Smyrna.

8           Q       It's almost like you have my questions  
9 over here. Did you ever go to the front desk to  
10 pay for the rooms?

11          A       No. I don't remember checking in there,  
12 no.

13          Q       Okay.

14          A       I remember checking in at, like, Extended  
15 Stay, yeah.

16          Q       Do you -- so you -- well, there's a  
17 difference. Okay. And I got that you don't  
18 remember checking in there.

19                 Do you recall ever going to the front desk  
20 to pay for a room?

21          A       I probably did. I probably did.

22          Q       And how did you pay?

23          A       Cash. It was always cash.

24          Q       Were reservations made or was it walk-ups?

25          A       If we decided to stay, walk-ups.

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1 Q Okay. But you don't remember checking in,  
2 so that would have been either --

3 A Yeah, I don't remember checking in,  
4 though.

5 Q Did you stay in different rooms or was it  
6 always --

7 A So the first time when Bless and the whole  
8 gang was involved, the guys stayed upstairs and it  
9 was me and [REDACTED] and [REDACTED] was Slim's girl.

10 Q Okay.

11 A We stayed downstairs working. So they  
12 were above us and we were underneath.

13 Q Which building?

14 A The last one.

15 Q The one in the back?

16 A Uh-huh.

17 Q And were y'all --

18 A The one close to the bushes.

19 Q Right. And were y'all on the back side of  
20 the back building?

21 A Yeah, facing the bushes.

22 Q All right. Facing that parking lot that  
23 faces the fence there?

24 A Yeah. So we're here and literally -- now  
25 it's a building.

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1 Q Right.

2 A But yeah.

3 Q It's not the one facing the other  
4 building?

5 A No, no, no. We're facing bushes.

6 Q Gotcha. And did you stay in different  
7 rooms the two or three times that you were there or  
8 was it always the same room?

9 A So every time -- it was usually towards  
10 that back.

11 Q Okay. Now, as we sit here now, now that  
12 we're talking about it, how many different rooms do  
13 you remember staying in?

14 A In Smyrna?

15 Q At the Red Roof in Smyrna.

16 A How many rooms on the different occasions  
17 or just in general?

18 Q Okay. So you've told me that you think  
19 you were there two to three times?

20 A Uh-huh.

21 Q Right?

22 A Yeah.

23 Q Now I'm trying to see if we can get it  
24 whether it's two or three.

25 A Okay.

1 A Yes.

2 Q And were you with a client then?

3 A No. That client was actually supposed to  
4 be coming.

5 Q Okay. All right. So in those times that  
6 you were -- those two or three times that you were  
7 there, were you ever in the room alone?

8 A With a client or...

9 Q No, no. Just were you --

10 A Just by myself?

11 Q Yes.

12 A No.

13 Q Okay.

14 A And even if I was physically in the room  
15 by myself, they would be outside smoking or on the  
16 phone. So I was never really just by myself.

17 Q Okay. Did you ever call the front desk?

18 A No.

19 Q Okay. So you never called for  
20 housekeeping? If you never called the front desk,  
21 you never called for housekeeping, right?

22 A Housekeeping automatically came in the  
23 morning.

24 Q Right. But I'm asking you: Did you call  
25 for housekeeping?



1 A I didn't call.

2 Q Okay. Did you ever turn away  
3 housekeeping?

4 A No.

5 Q Okay. So you let them -- when  
6 housekeeping would come, would you let them --

7 A I always needed them.

8 Q Say again.

9 A I always needed for them to come when they  
10 came.

11 Q So you never turned them away?

12 A No.

13 Q Did you ever call for more towels?

14 A Always.

15 Q So you did call for housekeeping?

16 A Oh, I thought -- I thought you meant call  
17 the front desk to ask them something.

18 Q Okay. So did you ever call --

19 A I did call for towels a lot, though.

20 Q Okay. Do you ever -- if you called the  
21 front desk and asked for something, what did you  
22 call and ask for?

23 A It was always more towels or rags.

24 Q Okay. Did you ever tell them you needed  
25 help?

1 A No.

2 Q Okay. Did you ever walk up to the front  
3 desk during your stay -- stays?

4 A I probably did to get the towels, yeah.

5 Q Okay. Did you ever talk to any hotel  
6 employees while you were staying at the Red Roof?

7 A No.

8 Q Did you ever tell any hotel employee that  
9 you were being held against your will?

10 A No.

11 Q Did you ever tell any hotel employee that  
12 you were being trafficked?

13 A No.

14 Q Did you ever ask a hotel employee for  
15 help?

16 A I didn't verbally ask, but housekeeping  
17 was the only hotel employee that I interacted  
18 with --

19 Q Okay.

20 A -- on a regular basis. And she was the  
21 one that was always in my room. After the night of  
22 the fight, even -- so that -- so we -- the night  
23 the fight happened and then there was also another  
24 occasion where Slim beat [REDACTED] up in the bathroom.

25 So we had two occasions with bloody towels

1 and sheets. And I remember, you know, just telling  
2 her, you know, like, there's a lot going on. But I  
3 was kind of timid to tell her straight up because I  
4 felt like she probably wouldn't be able to help me,  
5 and I didn't want to put myself in a position to be  
6 harmed.

7 Q Okay. You -- so there -- was the time  
8 that Slim beat up [REDACTED] the same time that the door  
9 got broken down?

10 A No.

11 Q Okay. So was there -- so that's two times  
12 we know about?

13 A Yeah.

14 Q Was there another time that you were  
15 there?

16 A I feel like there was because it was so  
17 easy for us to go there.

18 Q Okay. So the first time you were there,  
19 nothing different happened, nothing like somebody  
20 got beat up?

21 A Yeah, that's why I think -- yeah, that's  
22 why I'm saying it's three times because it was two  
23 separate occasions, one where [REDACTED] got beat up in  
24 the bathroom, second Bless came in.

25 Q Right. And y'all left the day after Bless

1 came in, right?

2 A Exactly, yeah.

3 Q And the day that [REDACTED] got beat up, y'all  
4 left the next day?

5 A Yeah.

6 Q Okay. So the first time you were there,  
7 was there anything out of the ordinary?

8 A Okay. So no.

9 Q Okay. The second time you said over the  
10 course of that stay, Slim beat up [REDACTED]

11 A Yeah.

12 Q Okay. But then y'all left the next day?

13 A Honestly, I'm not sure with [REDACTED] if we  
14 left the same day because I remember they had a  
15 second room. So no, they got another room the next  
16 day. It was for -- when they came in, the last  
17 time I was there, that's when we left the day  
18 after.

19 Q Did you ever show any physical signs of  
20 being trafficked while you were there?

21 A Physical signs? I didn't have any  
22 bruises.

23 Q All right. You weren't using needles,  
24 right?

25 A No.

1 Q All right.

2 A I was a little jittery.

3 Q Okay.

4 A But if you're not really paying attention  
5 to me, I don't think you would notice.

6 Q And that's what -- what is it about your  
7 stays at the Red Roof that you believe should have  
8 alerted folks at the hotel that you were being  
9 trafficked?

10 A Housekeeping, because housekeeping is the  
11 only person -- the only employee that I actually  
12 interacted with on a consistent basis.

13 Q So what is it about your interactions  
14 with -- what is it about your interactions with  
15 housekeeping that should have told housekeeping  
16 that you were being trafficked?

17 A Well, the same night [REDACTED] got beat up, I  
18 was worried about myself because I never seen a  
19 girl get beat like that.

20 Q Okay.

21 A So I didn't want to come straight up and  
22 tell her because I didn't want to put myself in  
23 harm, but I remember -- I remember, like, just the  
24 way I would give the things to the housekeeping  
25 lady, like I made sure, like, everything -- that

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1 you can see everything for what it is.

2 Because they come and take the trash and  
3 everything, I made sure the condoms were on the top  
4 because before they would try to cover up  
5 everything. And I'm like, no, I want for them to  
6 wonder because I don't want to tell her anything  
7 direct. I don't -- I know if Slim knew that I told  
8 them, they would have beat me up. I know they  
9 would have.

10 Q So have you --

11 A So what I did, when I handed her the  
12 towels, I told her, I said, "We had a really rough  
13 night last night."

14 And she was like, "Okay, sweetie, okay."

15 And I'm like, God, but it's like it  
16 never -- everything kind of went over her head.

17 Q Describe this woman to me.

18 A She was, like, a older Black lady.

19 Q So you showed her -- so you showed her a  
20 garbage can that had some condoms in it?

21 A Yeah. And I gave her the towels.

22 Q Okay. Let's -- but hold on. Stay with me  
23 here. So you show -- you gave her -- you gave her  
24 a garbage bag that -- or a garbage can that had  
25 condoms in it?

1 A Uh-huh.

2 Q How many condoms?

3 A It's a lot.

4 Q How many is a lot?

5 A A whole bunch of gold packs of condoms.

6 It looks like someone bought like a 36 pack of  
7 condoms and just opened them up and then just threw  
8 them in the garbage can.

9 Q You had 36 condoms in a -- 36 condom  
10 wrappers --

11 A Not literally 36 condoms.

12 Q Well, I'm asking you --

13 A Just a visual for how it looked like,  
14 because me and [REDACTED] were using the bottom room.

15 Q Okay.

16 A So between both of us, at least 16 to 18  
17 guys in a day. So the next day, that's what she's  
18 receiving.

19 Q Okay.

20 A Yeah.

21 Q And then you said to her, "We had a rough  
22 night last night"?

23 A Uh-huh.

24 Q You didn't say, "We had a rough night last  
25 night, help me," right?

1 A No.

2 Q Okay. So you -- so based upon some  
3 condoms in a garbage can, you think that --

4 A And then the bloody towels.

5 Q Hold on. Based on some condoms in a  
6 garbage can, you think this should have alerted her  
7 to something?

8 MR. BAUMRIND: Objection.

9 A Yes.

10 BY MR. KEITH:

11 Q Okay. And then you add the -- what should  
12 it have alerted her to?

13 A The fact that maybe the front desk should  
14 keep an eye on the cameras, because there's  
15 obviously a lot of sexual activity going on, for it  
16 only to be -- and [REDACTED] she looked more battered  
17 than I was. Obviously, she just got beat up. So  
18 she physically had the wounds, but it was obvious  
19 that there was something going on.

20 So my whole thing was trying to hint to  
21 her because the way I see it is if you work in a  
22 hotel, there should be some kind of protocol to  
23 know if there's activity like that going on.

24 Q So that's --

25 MR. BAUMRIND: Let her finish. Are you



1 finished?

2 THE WITNESS: Yeah.

3 MR. BAUMRIND: Okay.

4 BY MR. KEITH:

5 Q So that's your opinion, is that -- have  
6 you ever worked in a hotel?

7 A Yeah, I worked at Fontainebleau.

8 Q Okay. And then --

9 A And that was the protocol.

10 Q Okay.

11 A We had to be alert and be mindful of the  
12 people coming in and out, and it was a very  
13 high-end hotel, so we have to be extra keen.

14 So this hotel, I mean, the camera -- from  
15 what I can remember, the camera was right at the  
16 corner of the building. Bless, Slim, Drae, were  
17 the consistent three men stationed there with us.  
18 So they would either be in the car, upstairs  
19 watching, downstairs. Like it was obvious that  
20 something was going on.

21 Q But they were trying to keep it on the  
22 down low, though, too, weren't they?

23 A Yeah.

24 MR. BAUMRIND: Objection.

25 BY MR. KEITH:

1           A     No. Because [REDACTED] the undercover police  
2     went to go see her and had sex with her, and then  
3     came back around with a team of officers and took  
4     her in and convicted her for prostitution.

5           Q     Well, that's not what we're talking about  
6     here.

7           A     So...

8           Q     We're talking about you at the doctor's  
9     office. They didn't have sex with you.

10          A     I know. I know. But I'm just looking at  
11     it as far as involving the police. Because after  
12     that happening and then also the way I got  
13     arrested, just the way the police dealt with me in  
14     general, I didn't trust them.

15          Q     Because you knew what you were doing was  
16     illegal, right?

17               MR. McDONOUGH: Objection.

18          A     That's not what it was. Because I was  
19     still being controlled, so I was still a victim  
20     because it's still against what I wanted. But at  
21     the same time, I wanted to free myself and not have  
22     the police try to pin me down as being a prostitute  
23     because that's not what it was.

24     BY MR. KEITH:

25          Q     Okay. I know you don't think you were a

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1 were operating under, right?

2 A That's what I saw. That's what it was.

3 Q Okay. But you didn't personally involve  
4 the police to try to help you to see if they would  
5 help you?

6 A I already saw the interaction with the  
7 police.

8 Q Okay.

9 A And they weren't -- they weren't going to  
10 help us. They wanted to lock people up.

11 Q Okay.

12 MR. BAUMRIND: Can we take a restroom  
13 break in a little bit?

14 MR. KEITH: Yeah, in just a minute.

15 BY MR. KEITH:

16 Q Tell me about the -- tell me about the  
17 final stay at -- okay. Well, let me go back.

18 We've talked about the first one. We've  
19 talked about the second one. The final one is the  
20 one where the door got knocked down?

21 A Yeah.

22 Q Okay. Tell me about that one.

23 A So that time, that was our last time  
24 staying there. That was when we officially broke  
25 from Bless. So it was me and Drae. And that

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1 night, it was like around -- in between like 10:00  
2 11:00. It wasn't too late in the night.

3 But all I remember was the door -- just  
4 pow, and the door just came in. So right there, I  
5 thought it was either the police, the SWAT team, or  
6 some thugs looking for revenge. But either way, I  
7 thought I was going to die. That's what I felt  
8 right away when that door came down.

9 So it was Bless, Cash and Kwan.

10 Q Hold on. Okay.

11 A Yeah, it was Bless, Cash and Kwan. And  
12 they were -- they just charged at Drae. So Cash  
13 and Kwan just charged at Drae. They were just  
14 beating him up all the way to the bathroom.

15 And then Bless came over to me and he told  
16 me that -- he was just mad at me. He was telling  
17 me I'm stupid for leaving with him. That he stole  
18 money from him. That he's lying. That he's trying  
19 to --

20 Q "Him" being Drae?

21 A Drae, yeah.

22 Q Use the name if you can.

23 A Okay, okay, okay. Yeah, he told me that  
24 I'm stupid for leaving with Drae because he could  
25 have had me killed. That he stole from him before

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1           A       Excuse me. Depending on how much money  
2 they wanted me to make.

3 BY MR. KEITH:

4           Q       Did you have a daily quota?

5           A       It was like between -- it had to be at  
6 least 500 a day.

7           Q       Okay. And the prices were 100 -- 80 to  
8 100 for a half hour or two to 250 for an hour?

9           A       Yeah.

10          Q       So if you had two two-hours, you could be  
11 done with that 500 in --

12          A       Well, they wouldn't just make me stop,  
13 though. They would make me keep going.

14          Q       They made you?

15          A       Yeah.

16          Q       How did they make you?

17          A       Because if -- like if I had two, three  
18 dates that were all an hour, they would say, okay,  
19 well, keep working for days that may be slow  
20 because there was days that were -- you know, like  
21 if -- if they see, like, some police activity or,  
22 you know, anything like that, automatically,  
23 they'll stop.

24          Q       So some days you didn't do any?

25          A       It was rare unless it was, like, if we're

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1 on the go, if we're moving from hotel to hotel, it  
2 just depends. But every day I had to do something.

3 Q The time period that you've told me that  
4 your three -- two or three trips to the Red Roof  
5 includes November 2015 to February of 2016?

6 A Yes.

7 Q And in November is Thanksgiving, and in  
8 December is Christmas, and then January is New  
9 Year's Day. Did you have to work on Christmas day?

10 A Honestly, I don't even remember that.

11 Q Did you work on Thanksgiving?

12 A I don't -- I was -- I don't remember.

13 Q You were pretty coked up during this whole  
14 time?

15 A Uh-huh.

16 Q Yes?

17 A Yes.

18 Q So when you tell me it was average seven  
19 people a day, that's what you remember based  
20 upon --

21 A Yeah, because that was like a everyday  
22 thing.

23 Q But you don't remember some days at all,  
24 right?

25 A Some days were a fog, yeah, yes.

1 Q So when we say seven, that's just a best  
2 average that you can say?

3 A Uh-huh, yes.

4 Q Yes?

5 A Yes.

6 Q Okay. How many days a week did you work?

7 A Every day, seven days a week.

8 Q How often did you get a day off?

9 A Unless we're, like, moving from motel to  
10 hotel, and even still, I would have to, like, see  
11 at least -- at least two. I never had a day where  
12 it was just do nothing.

13 Q So in those -- in that time period, from  
14 August -- end of August until the beginning of  
15 April, it's your testimony you never had a day off?

16 MR. BAUMRIND: Asked and answered.

17 A No. There wasn't a day where it's like,  
18 okay, Jamaica, you can do whatever you want to do.

19 BY MR. KEITH:

20 Q So if -- so October, November, December,  
21 January, February, March, that's 152 days, okay? I  
22 just figured that up. So of those 152 days, you  
23 think it's fair to say that you averaged seven men  
24 a day over that entire time?

25 A Well, it wasn't consistent every single

1 day.

2 Q It was actually -- I'm sorry, that's  
3 wrong. It's 182 days.

4 A But that was the goal.

5 Q It's 182 days. I'm sorry. So let me ask  
6 that again and get it clean.

7 October to March is 182 days?

8 A Okay.

9 Q Do you believe you averaged seven men a  
10 day over that time?

11 A Yes.

12 Q That's 1,274. If you add -- if you  
13 multiply 182 by 7, that's 1,274, okay?

14 A Uh-huh.

15 Q You think you had sex or some type of  
16 sexual relation 1,274 times while you were  
17 trafficked over that six-month period?

18 A Yes.

19 Q You say that you stayed at the hotel, the  
20 Red Roof hotel in Smyrna, two or three times for  
21 three or four times -- three or four days at a  
22 time, right?

23 A Yeah.

24 Q And you think you averaged seven sexual  
25 encounters during all those?



1 A For sure at Smyrna, yes.

2 Q Even that one where the door got kicked in  
3 and you had to --

4 A That night was different because of that.  
5 That really shook me up, so -- and then even I  
6 think Drae didn't let me see anyone because he  
7 didn't want to cause any more attention. I'm not  
8 sure. But I didn't see anyone else that night.

9 Q Well, if we average -- if we go ahead and  
10 use your average, that would be 84 sexual  
11 encounters over the max -- that would be four --  
12 three trips for four days at a time, times seven,  
13 that's 84, okay? Agree with that math?

14 A Yes.

15 Q That would mean that over the six months,  
16 that somewhere around 6.5 percent of the sexual  
17 encounters that you had while you claim you were  
18 trafficked were at the Red Roof Inn, okay?

19 A Yes. 6.5 percent?

20 Q Yeah.

21 A Just at?

22 Q Just at the Red Roof.

23 A Yes.

24 Q Okay. Now, that means that there are  
25 ninety what, 3 and a half, 93 and a half percent of

1 the time that you were being trafficked, you were  
2 having sex somewhere else, right?

3 A At a different hotel, yes.

4 Q Right. Have you got any other lawsuits  
5 going?

6 A No.

7 Q Have you sued any other hotels?

8 A No.

9 Q No? Have you sued any other hotels on  
10 this 93.4 percent?

11 A No.

12 Q Why?

13 MR. McDONOUGH: Objection. I'm going to  
14 direct her -- that goes into attorney-client  
15 privilege who she decides to sue.

16 BY MR. KEITH:

17 Q When did -- when did you decide you wanted  
18 to file a lawsuit?

19 A When Nichole reached out to me because she  
20 already started her lawsuit and she had me as a  
21 witness.

22 Q So Nichole reached out to you --

23 A Uh-huh.

24 Q -- and talked you into filing a lawsuit or  
25 what?

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1           A       She talked to me about it, and she said  
2       that she had me as one of her top witnesses,  
3       because I was a part of it with her. So she told  
4       me to talk to her attorney so I'd feel more  
5       comfortable about the whole situation, see how I  
6       feel about it.

7           Q       Okay. Do you -- and is that Attorney Pat?

8           A       Yes.

9           Q       And Jon?

10          A       Just Pat. At the time --

11          Q       Just Pat?

12          A       -- it was just Pat.

13          Q       Okay. And when was that?

14          A       2019. Maybe 2018 or '19.

15          Q       Okay.

16          A       Yeah.

17          Q       And you decided that you wanted to join a  
18       lawsuit against Red Roof?

19          A       Yes.

20          Q       Do you think -- so you think -- well, let  
21       me ask you: Why are you suing Red Roof?

22          A       I almost got killed there out of all the  
23       other hotels, the door busted in, nobody from the  
24       hotel came to see me. It's like nobody was working  
25       there and nobody cared.

1 Q And you don't know if the housekeeping  
2 employee, or whoever was at the front desk, you  
3 don't know what legal entity they worked for,  
4 right? You don't know whether they worked for Red  
5 Roofs, Inc., correct?

6 A Yeah, I'm not sure.

7 Q You don't know if they worked for FMW RRI  
8 NC, LLC, correct?

9 A Yeah.

10 Q You don't know if they worked for Red Roof  
11 Franchising, LLC, correct?

12 A (Witness shakes head.)

13 Q You don't know if they worked for RRI West  
14 Management, LLC, correct?

15 A Yes.

16 Q You don't know if they worked for Varahi  
17 Hotel, LLC, correct?

18 A Yes.

19 Q You don't know if they worked for Westmont  
20 Hospitality Group, Incorporated, correct?

21 A Yes.

22 Q You know you testified earlier about the  
23 first encounter, Ms. [REDACTED] with Safari and the  
24 Safari Spa, correct?

25 A Yes.

1 cameras, doing tours around the hotel to see what  
2 was going on, anything.

3 Q The stuff that y'all were doing to --  
4 y'all were doing this on secret, right?

5 MR. BAUMRIND: Objection.

6 A It was a secret because it's illegal. But  
7 if there's three men, and it's obvious that they're  
8 not going for a regular 9:00 to 5:00 job, they're  
9 in their car, they're upstairs, they're walking  
10 around the hotel checking out the place to make  
11 sure no police are coming in or making sure -- like  
12 they were being the security for the hotel, not the  
13 hotel.

14 BY MR. KEITH:

15 Q So three men just being there -- what are  
16 they supposed to do? Three men walking around, not  
17 causing any problems. What are they supposed to  
18 do?

19 MR. BAUMRIND: Objection.

20 A It's enough for the manager of the hotel  
21 to ask some questions. They would be questioning  
22 in any other circumstance.

23 BY MR. KEITH:

24 Q How do you know?

25 A Three Black men that looked like they're

1 in gang activity walking around a hotel all day?  
2 If they were anywhere else, they would be  
3 questioned.

4 Q So let me make sure I got this right.  
5 Because three Black men are walking around a hotel,  
6 you want the owners to stop them?

7 MR. BAUMRIND: Objection.

8 A It's enough for it to bring attention  
9 because it would have brought attention any other  
10 place.

11 BY MR. KEITH:

12 Q I want to make sure I got this right.  
13 Because there were three Black men who looked, as  
14 you said, like gang members, that should have  
15 brought the weight of the hotel down on them?

16 MR. BAUMRIND: Objection.

17 A It would be enough -- because it wasn't  
18 just them, it was other people also at the hotel  
19 actively doing trafficking.

20 BY MR. KEITH:

21 Q Were they Black?

22 A Yes.

23 Q So because they're Black, is that what I'm  
24 hearing? What if they were White people, what if  
25 there were three White guys hanging out, would you

## 1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing  
5 transcript was taken down, as stated in the  
6 caption, and the colloquies, questions and answers  
7 were reduced to typewriting under my direction;  
8 that the transcript is a true and correct record of  
9 the evidence given upon said proceeding.

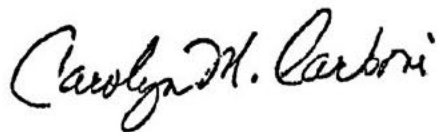
10 I further certify that I am not a relative  
11 or employee or attorney of any party, nor am I  
12 financially interested in the outcome of this  
13 action.

14 I have no relationship of interest in this  
15 matter which would disqualify me from maintaining  
16 my obligation of impartiality in compliance with  
17 the Code of Professional Ethics.

18 I have no direct contract with any party  
19 in this action and my compensation is based solely  
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this  
22 proceeding impacts my absolute commitment to serve  
23 all parties as an impartial officer of the court.

24 )22.



25 CAROLYN M. CARBONI, RPR, RMR, CCR-B-878